

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

FRANCESCA GINO,

Plaintiff,

V.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE, SRIKANT DATAR,
JOHN DOES 1-10, AND JANE DOES 1-10,

Defendants.

Case No. 1:23-cv-11775-MJJ

DECLARATION OF JENNY K. COOPER

I, Jenny K. Cooper, hereby declare:

1. I am an attorney at the law firm of Ropes & Gray LLP and counsel for Defendant President and Fellows of Harvard College (“Harvard”).
2. I respectfully submit this Declaration in support of Harvard’s Motion for Leave to File Second Amended Answer and Counterclaim filed with the Court contemporaneously herewith.
3. Attached hereto as Exhibit 1 is a true and correct copy of Harvard’s proposed Second Amended Answer and Counterclaim (the “Counterclaim”).
4. Attached hereto as Exhibit 2 is a true and correct redline comparison of the Counterclaim to Harvard’s Amended Answer to Plaintiff’s Second Amended Complaint (Doc. No. 89).

5. On December 4, 2024, Plaintiff and Harvard exchanged their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 16.1.

6. The parties have also served written discovery requests and responses.

7. On June 24, 2025, the parties met and conferred for the first time regarding Plaintiff's responses and objections to Harvard's First Set of Requests for Production and First Set of Interrogatories. The parties again met and conferred on June 27, 2025 to discuss Harvard's responses and objections to Plaintiff's First Set of Requests for Production and First Set of Interrogatories.

8. As of July 7, 2025, neither party has produced any documents or noticed any depositions.

Dated: July 7, 2025

Respectfully submitted,

/s/ Jenny K. Cooper

Jenny K. Cooper (BBO# 646860)

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*Counsel for Defendants President and
Fellows of Harvard College and Srikant
Datar*

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: July 7, 2025

/s/ Jenny K. Cooper
Jenny K. Cooper